Submission 006 Date received: 25/03/2011



24 March 2011

Committee Secretary House of Representatives Standing Committee on Infrastructure and Communications PO Box 6021 Parliament House CANBERRA ACT 2600

Dear Committee Secretary,

House Standing Committee on Infrastructure and Communications Inquiry into the Ratio of Cabin Crew Members on Aircraft

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) was formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 27 Ordinary Members (AOC holders) and 56 Associate/Affiliate Members. The RAAA's AOC members directly employ over 5,000 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight. Annex A lists the Ordinary Members of the RAAA.

RAAA members operate in all States and Territories and include airlines, airports, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional areas.

Some examples of RAAA members' presence in regional Australia is the REX hub in Wagga Wagga, SkyWest in WA, Sharp Aviation in Hamilton, Kimberley Aviation at Broome, Airnorth, Chartair and Vincent Aviation Northern Territory networks, West Wing Aviation in Mt Isa and Skytrans operations from Cairns, to name a few.

ABN: 23 008 568 054 Telephone: 02 6162 0305 Facsimile: 02 6162 0308 Email: office@raaa.com.au Website: www.raaa.com.au

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RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- ► lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

Inquiry into the Ratio of Cabin Crew Members on Aircraft Response

The RAAA supports strongly the position taken by Alliance Airlines with respect to the Inquiry into Cabin Crew Ratios and refers the Standing Committee on Infrastructure and Communications to Alliance's detailed submission.

The world standard from both a FAA and EASA standpoint with respect to cabin crew ratios is 1:50. This is a harmonised policy between these two bodies.

Modern aircraft are certified to operate with this ratio and it is part of the manufacturer's recommended operating procedures. It is a desirable outcome that Australia also harmonise its cabin crew regulations with the above regulatory bodies.

Given that the 1:50 ratio is internationally accepted by major aviation regulators it seems superfluous for Australian operators to be required to conduct a risk management study before being authorised to fly with one cabin crew for every 50 passengers or passenger seats.

The existing Australia-only 1:36 ratio does not provide any substantive safety or security benefit.

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The 1:50 rule meets the CASA requirement of a demonstrated capability to evacuate an aircraft in 90 seconds.

CASA has recognised the need to harmonise on international standards for cabin crew ratios and issued a Notice of Proposed Rule Making – Cabin Crew Ratios in February 2010. This process was halted in December 2010 and remains in limbo. No reasons have been given for this halt although it is understood that the basis may lay with industrial issues rather than there being safety or security concerns.

The RAAA supports compliance with the relevant FAA and EASA standards on cabin crew ratios and calls on CASA to reactivate the NPRM process that will lead to Australian regulatory harmonisation with these international standards.

If the RAAA can be of any further assistance in this matter please don't hesitate to contact me.

Regards

Paul Tyrrell Chief Executive Officer Submission 006 Date received: 25/03/2011 Annex A: RAAA Ordinary Members







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CORPORATE AIR

kimberley aviation





CURRY























VINCENT AVIATION



KENNY

AIRLINES



Doctor Service



Doctor Service





